LAWLER, METZGER & MILKMAN, LLC

1909 K STREET, NW SUITE 820 WASHINGTON, D.C. 20006

GIL STROBEL
PHONE (202) 777-7728

PHONE (202) 777-7700 FACSIMILE (202) 777-7763

February 7, 2002

Via Electronic Filing

William F. Caton Acting Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Re: CC Docket No. 96-45

Oral Ex Parte Presentation

Dear Mr. Caton:

On February 6, 2002, Mary Brown of WorldCom, Inc. (WorldCom) and A. Richard Metzger, Jr. of Lawler, Metzger and Milkman, counsel to WorldCom, met with Matthew Brill, legal advisor to Commissioner Abernathy, and Kyle Dixon, legal advisor to Chairman Powell, to discuss reform of the current system for allocating the costs of federal universal service programs among interstate carriers.

In these discussions, WorldCom reiterated its support for a connection-based approach and expressed opposition to proposals, such as the waiver request submitted by AT&T, that divert resources from the Commission's prompt adoption of the reforms supported by WorldCom and other parties to this proceeding.

Consistent with the Commission's rules, this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

/s/ Gil M. Strobel
Gil M. Strobel

Cc: Matthew Brill Kyle Dixon